

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
SPRINGFIELD DIVISION

ACCESS 4 ALL, INC., a Florida not-for-profit
corporation, and FELIX ESPOSITO,
individually,

Plaintiffs,

CASE NO. 1:04-cv-12347-KPN

v.

DELANCEY CLINTON ASSOCIATES, L.P.,
a Pennsylvania Limited Partnership,

Defendant.

_____ /

**PLAINTIFFS' AGREED MOTION FOR AN EXTENSION OF TIME
TO RESPOND TO DEFENDANT'S INTERROGATORIES
AND REQUEST FOR PRODUCTION**

Plaintiffs, ACCESS 4 ALL, INC., a Florida not-for-profit corporation, and FELIX ESPOSITO, individually, for good cause, respectfully move for an extension of time to respond to Defendant's First Set of Interrogatories and Request for Production, and state as follows.

1. Defendant served its First Set of Interrogatories and Request for Production on or about July 21, 2005. Plaintiffs' response is due August 21, 2005.

2. Plaintiffs, in good faith, have been attempting to obtain the information requested by Defendant, but are unable to obtain all of the information requested within the time allowed, and therefore require additional time to fully respond.

3. This is the first request for extension of time with respect to this discovery.

4. Plaintiffs respectfully request an extension of fifteen (15) days, up to and including **September 9, 2005** to respond to Defendant's First Set of Interrogatories and Request for Production.

CERTIFICATE OF CONFERENCE

I HEREBY CERTIFY that counsel for the Defendant was contacted and agreed to Plaintiffs' request for an extension of time to September 9, 2005, to respond to Defendant's Interrogatories and Request for Production.

Respectfully submitted,

/s/John P. Fuller
John P. Fuller, Esq.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished to Michael Colgan Harrington, Esq., MURTHA CULLINA, LLP, 185 Asylum Street, CityPlace I, Hartford, CT 06103, via facsimile to (860) 240-6150 on this 19th day of August, 2005.

/s/John P. Fuller
John P. Fuller, Esq., Pro Hac Vice
FULLER, FULLER AND ASSOCIATES, P.A.
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ORDER

This case came on for hearing on the Plaintiffs' Agreed Motion for an Extension of Time to September 9, 2005, to respond to Defendant's Interrogatories and Request for Production, and the Court being fully advised of the urgency of the parties, and being otherwise advised, it is,

ORDERED and ADJUDGED:

1. Plaintiffs' Agreed Motion for an Extension of Time to Respond to Defendant's Interrogatories and Request for Production is **GRANTED**.

2. The Plaintiffs shall have until **September 9, 2005** to respond to Defendant's Interrogatories and Request for Production.

DONE AND ORDERED, this ____ day of _____, 2005., in
_____, Massachusetts.

United States District Judge

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ORDERED and ADJUDGED:

1. Plaintiffs' Agreed Motion for an Extension of Time to Respond to Defendant's Interrogatories and Request for Production is **GRANTED**.

2. The Plaintiffs shall have until **September 9, 2005** to respond to Defendant's Interrogatories and Request for Production.

DONE AND ORDERED, this ____ day of _____, 2005., in
_____, Massachusetts.

United States District Judge